

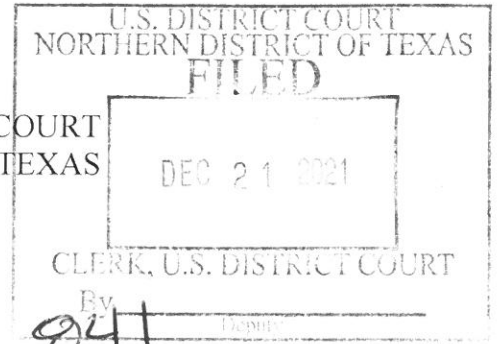
IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

JOSEPH MICHAEL DUPREE (01)

No. 4:21-MJ-



CRIMINAL COMPLAINT

Alleged Offense:

I, Special Agent William Wallace, being duly sworn, state the following is true and correct to the best of my knowledge and belief

On or about November 10, 2021, in the Fort Worth Division of the Northern District of Texas, defendant **Joseph Michael Dupree**, being a person who has previously been convicted in a court of a crime punishable by imprisonment for a term in excess of one year, that is, a felony offense, did knowingly possess in and affecting interstate commerce, the following firearm(s), that is, a Smith & Wesson, M&P Shield, 9mm pistol bearing serial number HPP1855, in violation of 18 U.S.C. § 922(g)(1) and § 924(a)(2).

Probable Cause

1. I, Special Agent William "Aaron" Wallace (Affiant), am a Special Agent with the Texas Department of Public Safety (TX DPS) Criminal Investigations Division (CID) and have been employed since 2010. Affiant is also a Special Deputy with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and have served in that capacity since 2019. Affiant is presently assigned to the ATF Dallas Field Division (DFD) Group II to investigate violations of Federal firearms and violent crime laws.

2. Affiant, under oath, duly states that the facts set forth in the affidavit are based on my personal knowledge and experience, and information provided by other law enforcement officers that are true and correct to the best of my knowledge. This affidavit is being submitted for the purpose of securing an arrest warrant for **Joseph Michael DUPREE**. I have set forth facts that I believe are necessary to establish probable cause that **Joseph Michael DUPREE** has violated 18 U.S.C. § 922(g)(1), 18 U.S.C § 924(c).

3. Affiant states that the following affidavit may or may not contain all the facts known to the Affiant. Furthermore, the facts contained in the affidavit may be summarized and not verbatim, nor does it necessarily reflect the chronology of stated facts.

4. In early November 2021, Special Agent (SA) Allen Navarro with the Texas Department of Public Safety (TX DPS) Criminal Investigations Division (CID) obtained information from a cooperating individual (CI) that a black male, later identified as being **Joseph Michael DUPREE**, was in possession of a large quantity of narcotics and multiple firearms.

5. On November 8, 2021, SA Navarro and affiant conducted physical surveillance on **DUPREE** leaving parole in Haltom City, Texas. At that time **DUPREE** was operating a blueish green BMW bearing TXLP# DJY5300. Special Agents eventually lost **DUPREE** that afternoon.

6. On November 10, 2021, SA Navarro, working in conjunction with Troopers assigned to the Texas Highway Patrol (THP), coordinated surveillance on the BMW after it was located at the Verandas Apartments at City View, located at 7301 Oakmont Blvd in south Fort Worth, Texas.

Special Agents were attempting to conduct physical surveillance on **Joseph Michael DUPREE**, who had also been identified as a known Gangsters Disciple gang member through query of criminal gang database.

7. During surveillance, SA Navarro observed a 2001 GMC Yukon bearing OK LP# LIU052 parked next to the BMW that SA Navarro knew to be associated with **DUPREE**.

8. SA Navarro queried the license plate of the GMC Yukon against law enforcement databases and learned that the color listed on the computerized motor vehicle registration was different than the actual color of the vehicle. SA Navarro obtained the vehicle identification number (VIN) which was displayed in plain view on the front dash of the vehicle. SA Navarro then queried the VIN against law enforcement databases and learned that the vehicle was stolen out of Durant, Oklahoma.

9. Trooper Roberson contacted a wrecker to recover the stolen vehicle before surveillance was to be terminated. While the wrecker was still en-route, a black male, later identified as **DUPREE**, approached and appeared to access the BMW, and appeared to open the driver's side door of the BMW, before entering the into the Yukon, and moved it to a different parking space within the parking lot.

10. SA Navarro, wearing clearly identifying Police markings, recognized the black male as being **DUPREE** and approached and detained **DUPREE**, pursuant to an investigation of the stolen vehicle.

11. After detaining **DUPREE** and advising him the reason of detention, Agent Navarro conducted a pat down search of **DUPREE**, while asking **DUPREE** if he had any guns, knives, or weapons on him.


DUPREE advised he had a gun which was in his front waist. Agent Navarro then removed a Smith and Wesson 9 mm handgun loaded with clip and ammunition from the front waist of **DUPREE** pants.

12. **DUPREE** was then handcuffed and searched and found to be in possession of a 40-caliber cartridge that was in his front pants pocket. A set of car keys, which appeared to include a BMW car key, were also removed from **DUPREE'S** person, and secured.

13. A criminal history check of **DUPREE** revealed that **DUPREE** has a felony conviction for Possession of a Controlled Substance on 01/13/2006 from the 415th District Court Parker County Cause # 15259. **DUPREE** also has a felony conviction for Felon in Possession of Firearm on 04/06/2010 from the 43rd District Court of Parker County Cause# CR09-0536.

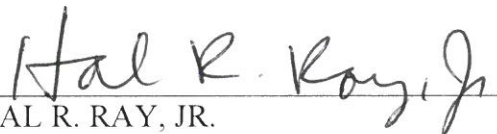
14. On November 29, 2021, Affiant contacted ATF Special Agent B. Gresham, qualified in interstate/foreign nexus determinations. ATF Special Agent B. Gresham verbally stated that the firearm identified in paragraph seven was not manufactured within the State of Texas and that said firearm would have to have travelled in interstate and/or foreign commerce to be present in the State of Texas.

15. Based upon the foregoing and to the totality of evidence, probable cause exists to believe that Joseph **DUPREE** has violated Title 18 U.S.C. Section 922(g)(1) and is a felon in possession of a firearm.



William "Aaron" Wallace, Special Agent
Texas Department of Public Safety
Criminal Investigations Division/
Special Deputy
Bureau of Alcohol, Tobacco, Firearms & Explosives

SWORN AND SUBSCRIBED before me, December 21, 2021 at 10:47
a.m./p.m., in Fort Worth, Texas.



HAL R. RAY, JR.
United States Magistrate Judge